

## Diane Holt

---

**From:** arhausrath@gmail.com  
**Sent:** Sunday, November 19, 2017 5:23 PM  
**To:** Beverly Barker; Diane Holt; Matthew Evans  
**Subject:** Case Comment Form: Alan Hausrath

Name: Alan Hausrath  
Case Number: IPC-E-17-11  
Email: arhausrath@gmail.com  
Telephone: 2083459631  
Address: 1820 N. 7th Street  
Boise ID, 83702

Name of Utility Company: Idaho Power

Comment: I attended many of the Idaho Power 2017 IRP meetings, read the materials from the rest, and have a few comments based on my experience there. I would like to thank Idaho Power for the opportunity to participate in the process and for the friendly and generous way it was organized.

1. The development of the set of portfolios--the alternative energy futures studied--was not transparent and they seemed to be chosen with a goal in mind: to justify the construction of the Boardman to Hemingway transmission line. Because of this, the set of portfolios was restricted in breadth and did not seem to span the entire universe of possibilities. For example, portfolios using more solar or wind were certainly conceivable, but they were never presented or studied. The Commission should direct Idaho Power (IPCO) to use a transparent process to develop portfolios in the 2019 IRP and to study a set of portfolios that represents all of the reasonable possibilities.
2. IPCO was not consistent in their resource costs. They used Lazard's higher end cost for solar power, but the lower end cost for gas. This built in a bias toward gas fired generation and away from solar. With the release of Lazard 11.0, IPCO's costs are even more outdated; their levelized cost of energy of \$88 per MWh for utility scale solar doesn't even fit into Lazard's estimated range of \$46--\$53 from LCOE 11.0. In addition, Lazard now predicts wind as the cheapest energy source and IPCO doesn't intend to use any more than what they currently have. Part of the problem is that IPCO applies current inflation rates to all energy resources. This clearly hasn't been true for solar for several years; prices keep dropping. The Commission should direct IPCO to use the middle number from Lazard for each energy source in the 2019 IRP and not allow them to arbitrarily exclude the cheapest sources.
3. IPCO's study of the value of distributed energy resources to defer or eliminate T&D upgrades was infuriatingly limited and shallow. The Commission should direct IPCO to analyze the differing costs of delivering power to a widespread and representative set of points in its service area so that DER's and targeted efficiency measures can be properly evaluated based on where they are applied.
4. IPCO consistently underestimates resources it can obtain from energy efficiency (EE). It assumes future savings that are much lower than the levels currently being achieved by its cost-effective programs. The Commission should direct IPCO to fairly evaluate energy resources it can obtain from EE in its 2019 IRP.

Thank you for the opportunity to comment.

Unique Identifier: 174.27.81.44